

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

INTELLECTUAL VENTURES I LLC and
INTELLECTUAL VENTURES II LLC

Plaintiffs,

v.

GENERAL MOTORS COMPANY and
GENERAL MOTORS LLC

Defendants.

Civil Action No. 6:21-cv-1088

JURY TRIAL DEMANDED

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS' COMPLAINT**

Defendants General Motors Company and General Motors LLC ("Defendants") file this Unopposed Motion for Extension of Time to Respond to Plaintiffs' Complaint and state:

1. On October 19, 2021, Plaintiffs filed a Complaint against Defendants alleging infringement of twelve (12) patents. Dkt. No. [1].

2. Defendant General Motors LLC was served on October 25, 2021. Dkt. No. [11]. Defendant General Motors Company was served on November 2, 2021. Dkt. No. [14]

3. Defendant General Motors LLC's response to the complaint is currently due on November 15, 2021. Dkt. No. [11]. Defendant General Motors Company's response is currently due on November 23, 2021. Dkt. No. [14].

4. Defendants contacted Plaintiffs and requested an extension to answer or otherwise respond to the Complaint, up to and including January 7, 2022. Defendants' request seeks a 45-day extension for Defendant General Motors Company and a 53-day extension for Defendant General Motors LLC. Plaintiffs have indicated that they do not oppose the extension.

5. Good cause exists for the requested extension. Plaintiffs' complaint alleges infringement of twelve (12) patents, and levies essentially the same infringement allegations against both Defendants. The requested extension will align the deadlines for each to respond to the Complaint and overall case schedule for both Defendants and provide additional time, particularly given the upcoming Holiday period, for Defendants to investigate and to prepare a response to Plaintiff's allegations with respect to each of the twelve patents.

6. Attached is a proposed Order granting Defendants' unopposed motion for an extension of time to respond to Plaintiffs' Complaint.

WHEREFORE, Defendants respectfully request that this Honorable Court issue an Order granting an extension of time, up to and including January 7, 2022, to answer or otherwise respond to Plaintiffs' Complaint.

Dated: November 12, 2021

Respectfully submitted,

KING & SPALDING LLP

/s/ Steven M. Zager

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Company and General Motors LLC*

CERTIFICATE OF CONFERENCE

I hereby certify that on November 9-12, 2021, I and other counsel representing Defendants General Motors Company and General Motors LLC conferred via email and with counsel for Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC, regarding the foregoing Motion to Extend Time to Respond to Plaintiffs' Complaint and counsel has indicated that they do not oppose the relief being sought in the within Motion.

/s/ Jeffrey D. Mills

Jeffrey D. Mills

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2021, I electronically filed the foregoing Motion with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record who have consented to electronic notification. I further certify that I caused a copy of this document to be mailed by first-class mail to all non-CM/ECF participants.

/s/ Jeffrey D. Mills

Jeffrey D. Mills